



- Investigators on or applying for non-NIH/NSF grants: For investigators sponsored by or seeking funding from non-NIH/NSF and/or other federal agencies, the above training activities are optional but strongly recommended.

DISCLOSURE OF SIGNIFICANT FINANCIAL INTEREST (SFI)

Hope College requires full-time faculty and senior personnel who propose to receive funds from NIH or NSF for research, materials development, training or equipment projects must disclose, prior to proposal submission, whether any conditions exist which might create an actual or apparent “Significant Financial Interest” (SFI). This disclosure is initiated when the Investigator answers YES to either of these two questions that appear on the College’s Early Notification Form.

1. Does the Investigator, senior personnel, his or her colleagues, family, or associates have a significant financial interest (over \$5000) or other conflict that would reasonably appear to be affected by the conduct or outcome of the grant-funded activities?
2. Will the significant financial interest potentially affect the integrity of the project, i.e. how the project is run or what kinds of results are reported?

The Investigator is then required to complete the FCOI Disclosure Form using the following SFI definitions and exceptions:

- SFI Definition – minimum threshold of \$5000 received within 12 months preceding disclosure
 1. *Equity Interest – Non-publicly traded entity* (e.g. stock, stock option, or other ownership interest).
 2. *Equity Interest – Publicly traded entity* (e.g. stock, stock option, or other ownership interest).
 3. *Intellectual property rights* (e.g. royalties, patents, copyrights) not from the awardee institution (Hope College)
 4. *Investment vehicles*, such as mutual funds and retirement accounts, controlled by the investigator. This does not include Hope College’s retirement packages.
 5. *Other* (provide an explanation that describes the SFI)
 6. *Payment for services* (e.g. consulting fees, honoraria, paid authorship)
 7. *Reimbursed or sponsored travel* – This includes responsibilities including instruction, research or service to Hope College, **with the exception** of any travel reimbursed or sponsored by a federal, state or local government agency, an institution of higher education, an academic teaching hospital, a medical

its duration. Additional information, including the estimated cost of travel, may be requested by Hope College administrators and must be furnished upon request.

signed until FCOI forms for all Investigators and senior personnel are submitted to her/his designated academic Dean. By signing this form the applicant certifies that he/she has read this section of the Faculty Handbook and that he/she either:

- a) does not have potential FCOI or
- b) does have potential conflicts

In either case, the applicant also declares that he/she will notify the designated academic Dean of any change or discovery requiring modification of the above

The management plan may include conditions or restrictions to manage, reduce, or eliminate FCOI, which may include (but may not be limited to):

- a) Monitoring of research by independent reviewer
- b) Modification of the research plan
- c) Disqualification from participation in the portion of the funded research that would be affected by SFI
- d) Divestiture of SFI
- e) Severance of relationships that create conflicts
- f) Public disclosure of FCOI

The Investigator and/or senior personnel will be consulted as to the implementation of the MP who must agree to the plan before the research can proceed. If the FCOI committee and the Investigator cannot agree upon a MP, the relevant regulatory bodies and funding agencies will be notified.

ENFORCEMENT

The College shall “establish adequate enforcement mechanisms and provide for employee sanctions”, but also to provide for other administrative actions to ensure Investigator compliance as appropriate”. Disciplinary proceedings initiated in connection with this policy shall be conducted in accordance with the Hope College Faculty Handbook or the Student Code of Conduct. All relevant regulatory bodies and funding agencies will be promptly informed of disciplinary sanctions.

RECORDS

The College shall maintain records of all financial disclosures and all actions taken to resolve FCOI for at least 3 years from the date the final expenditures report is submitted to the federal agency, or until the resolution of any federal action involving those records, whichever is longer.

SUB RECIPIENTS

The College is responsible for ensuring all sub recipients’ compliance with the applicable federal regulations regarding FCOI. When an Investigator notifies the College of her/his intent to apply for a NIH or NSF grant using the Early Notification Form, s/he will identify on this form if a sub recipient is affiliated with the project. It is the responsibility of the Investigator to ensure the sub recipient provides any necessary FCOI documentation prior to the proposal submission.

To this end, the College shall enter a written agreement with each sub recipient that shall specify whether this policy, or the applicable policy of the sub recipient’s institution, will apply to sub recipient Investigators. Said agreement will specify the timing for reporting of FCOIs by sub recipients to Hope College to enable the timely review and reporting of such FCOIs in compliance with funding agency requirements. The College will report to the federal agencies within 60 days of any subsequently identified FCOI.